

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1:24-CR-00096
	:	
	:	
V.	:	(Judge Wilson)
	:	
DURANTE KING-MCLEAN and	:	
JALISA EDWARDS,	:	
Defendants	:	

**DEFENDANT’S MOTION TO CONTINUE TRIAL AND PRE-TRIAL  
MOTIONS DEADLINE**

AND NOW, this 23<sup>rd</sup> day of April, 2025, comes the above-named Defendant, Durante King-McLean by and through his attorney, Jessica L. Bush, Esquire and DETHLEFS-PYKOSH LAW GROUP, LLC, respectfully requests This Honorable Court to grant a continuance and, in support thereof, avers the following:

1. On April 20, 2024 Defendant was indicted for the following offenses at the above-captioned docket number:

- a. Conspiracy to Traffick in Firearms;
- b. Illegal Alien in Possession of a Firearm;
- c. Attempt to Unlawfully Export Firearms;
- d. Illegal Possession of a Machinegun;
- e. Possession of Firearm With Obliterated Serial Number;
- f. Possession of a Stolen Firearm.

2. On May 13, 2024, Defendant entered a Not Guilty Plea.

3. Undersigned counsel was appointed on May 13, 2024.

4. Jury Selection and Trial are currently scheduled for May 5, 2025.

5. A Change of Plea Hearing for Mr. King-McLean has been scheduled for May 14, 2025 at 10:00 a.m.

6. Undersigned counsel is respectfully requesting that Jury Selection and Trial be continued for an additional sixty (60) days, so as to allow Mr. King-McLean's Change of Plea Hearing to be held.

7. Undersigned counsel contacted Barbara A. Zemlock, counsel for Defendant Jalisa Edwards who has joined in the motion *sub judice* and concurs in the request for continuance.

8. Undersigned counsel contacted William A. Behe, Esquire with the United States Attorney's Office who is in concurrence with the filing of this Motion.

WHEREFORE, a sixty (60) day continuance is respectfully requested to a date set by Your Honor.

Dated: April 23, 2025

Respectfully submitted,  
**DETHLEFS-PYKOSH LAW  
GROUP, LLC**  
/s/ Jessica L. Bush  
Jessica L. Bush, Esquire  
PA ID No. 094624  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
jbush@dplglaw.com

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**CERTIFICATE OF CONCURRENCE**

I, Jessica L. Bush, counsel for Defendant, Durante King-McLean, hereby certifies that the Assistant US Attorney, William A. Behe, Esquire counsel for Plaintiff, was contacted prior to the filing of this Motion to Continue and that said party concurs with the entry of an Order granting Defendant's Motion.

/s/ Jessica L. Bush

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Jessica L. Bush, Esquire

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JALISA EDWARDS	:	
Defendants	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the **Defendant's Motion to Continue, Certificate of Concurrence, and proposed Order** in this proceeding via electronic filing upon the following:

**William A. Behe, Esquire**  
Sylvia H. Rambo United States Courthouse  
Office of the US Attorney  
1501 N 6<sup>th</sup> Street  
Harrisburg, PA 17102

**Barbara A. Zemlock, Esquire**  
Tucker Arensberg, P.C.  
300 Corporate Center Drive, Suite 200  
Camp Hill, PA 17011

Date: April 23, 2025

/s/ Elizabeth A. Wintermyer  
Elizabeth A. Wintermyer, Paralegal  
for Jessica L. Bush, Esquire